

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TERRENCE J. HANCOCK, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 08 C 0934
)	
WHAT IF, INC., an Illinois corporation,)	JUDGE RONALD GUZMAN
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, TERRENCE J. HANCOCK, et al., in the total amount of \$26,458.48, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$600.00.

On February 19, 2008, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Gerald L. Lopatka) at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on March 10, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on Thursday, the 15th day of May 2008, on or before the hour of 5:00 p.m., he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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